

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Nicholas J. Cremona

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and for the Estate of Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

KELMAN PARTNERS LIMITED PARTNERSHIP, a
Delaware limited partnership, C.D. KELMAN
CORPORATION, a Delaware corporation,
CHARLES D. KELMAN REVOCABLE TRUST
DATED MAY 16, 2001, AS RESTATED AND
AMENDED, a Florida trust, STEVEN A. BELSON,
as trustee, DARREN S. BERGER, as trustee,
MARITAL TRUST UNDER ARTICLE X OF THE
CHARLES D. KELMAN REVOCABLE TRUST, a

Adv. Pro. No. 10-05158 (SMB)

Florida trust, ANN G. KELMAN, as trustee and as an individual, STEVEN A. BELSON, as trustee, DARREN S. BERGER, as trustee, TRUST FOR LESLEY A. KELMAN KOEPPPEL UNDER ARTICLE XII OF THE CHARLES D. KELMAN REVOCABLE TRUST, a Florida trust, JENNIFER KELMAN, as trustee, LESLEY A. KELMAN KOEPPPEL, as trustee and as an individual, TRUST FOR JENNIFER KELMAN UNDER ARTICLE XII OF THE CHARLES D. KELMAN REVOCABLE TRUST, a Florida trust, LESLEY A. KELMAN KOEPPPEL, as trustee, JENNIFER KELMAN, as trustee and as an individual, TRUST FOR EVAN KELMAN UNDER ARTICLE XIII OF THE CHARLES D. KELMAN REVOCABLE TRUST, a Florida trust, ANN G. KELMAN, as trustee, STEVEN A. BELSON, as trustee, DARREN S. BERGER, as trustee, EVAN KELMAN, TRUST FOR J.K. [a minor] UNDER ARTICLE XIII OF THE CHARLES D. KELMAN REVOCABLE TRUST, a Florida trust, ANN G. KELMAN, as trustee, STEVEN A. BELSON, as trustee, DARREN S. BERGER, as trustee, J.K., a minor, TRUST FOR S.K. [a minor] UNDER ARTICLE XIII OF THE CHARLES D. KELMAN REVOCABLE TRUST, a Florida trust, ANN G. KELMAN, as trustee, STEVEN A. BELSON, as trustee, DARREN S. BERGER, as trustee, S.K., a minor, TRUST FOR CHARLES D. KELMAN'S GRANDCHILDREN AND MORE REMOTE DESCENDANTS UNDER ARTICLE VII OF THE CHARLES D. KELMAN REVOCABLE TRUST, a Florida trust, STEVEN A. BELSON, as trustee, and DARREN S. BERGER, as trustee,

Defendants.

SECOND AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures: have been exchanged.
2. Fact Discovery shall be completed by: March 9, 2015.
3. The Disclosure of Case-in-Chief Experts shall be due: July 13, 2015.
4. The Disclosure of Rebuttal Experts shall be due: August 12, 2015.
5. The Deadline for Completion of Expert Discovery shall be: November 9, 2015.
6. The Deadline for Service of a Notice of Mediation Referral shall be: January 7, 2016.
7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: January 21, 2016.
8. The Deadline for Conclusion of Mediation shall be: May 20, 2016.

Dated: New York, New York
December 29, 2014

Of Counsel:

BAKER & HOSTETLER LLP
11601 Wilshire Boulevard, Suite 1400
Los Angeles, California 90025-0509
Telephone: 310.820.8800
Facsimile: 310.820.8859
Michael R. Matthias
Email: mmatthias@bakerlaw.com

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona

David J. Sheehan
Nicholas J. Cremona
45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and for the Estate of Bernard L. Madoff*